

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SP PLUS LLC,

Plaintiff,

v.

Case No. 25-cv-02563

DAVIS DINIZ,

Defendant.

JOINT NEW CASE STATUS REPORT

Plaintiff SP Plus LLC (“SP Plus” or the “Company”) and Defendant Davis Diniz, by and through their undersigned counsel, hereby submit the following New Case Status Report in accordance with the March 12, 2025, Notification of Docket Entry (Dkt. No. 4).

(1) The Nature of the Case

a. Attorneys of record for each party, including the lead trial attorneys.

i. Counsel for Plaintiff

Stephen D. Riden, MA BBO No. 644451
Admitted Pro Hac Vice
BECK REED RIDEN LLP
155 Federal Street, Suite 1302
Boston, Massachusetts 02110
Phone: (617) 500-8660
sriden@beckreed.com

Timothy D. Elliott
Raymond J. Sanguinetti
RATHJE WOODWARD LLC
300 E. Roosevelt Road, Suite 220
Wheaton, Illinois 60187
Phone: (630) 510-4910
telliott@rathjelaw.com

ii. Counsel for Defendant

Abhishek Ramaswami
Illinois Bar No. ARCDC No. 6350613
Cadogan Law
1200 S. Pine Island Rd., Ste 370
Plantation, FL 33324
Phone: (954)606-5891
ab@cadoganlaw.com

Gina Cadogan, *Admitted Pro Hac Vice*
Fla. Bar No. 177350
Cadogan Law
1200 S. Pine Island Road, Ste. 370
Plantation, FL 33324
Phone: (954) 606-5891
gina@cadoganlaw.com

- b. Basis for federal jurisdiction: Plaintiff alleges in the Complaint that the basis for federal jurisdiction is 28 U.S.C. § 1332(a)(1), because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different states, and this Court also has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 because this matter involves a cause of action arising under the Federal Defend Trade Secrets Act (“DTSA”), 18 U.S.C. §§ 1836, *et seq.*
- c. Nature of the claims asserted in the complaint and any counterclaims, including relief sought: Plaintiff alleges in the Complaint that Defendant Diniz, a former employee of SP Plus, violated the terms of his employment agreement when he accepted a job with a competitor and misappropriated SP Plus’s confidential information. The Complaint asserts claims for violation of the Defendant Trade Secrets Act and Illinois Trade Secrets Act (or, in the alternative, the Florida Uniform Trade Secrets Act), breach of contract, and breach of fiduciary duty of loyalty. The Complaint seeks damages and equitable relief. Defendant has not asserted any Counterclaims, but generally denies the allegations of wrongdoing against him.

(2) Pending Motions and Case Plan

- a. Pending motions.
 - i. Plaintiff’s Motion for Rule to Show Cause as to Why Defendant Davis Diniz Should Not Be Held in Civil Contempt of Court (Dkt. No. 25).
 - ii. Defendant’s Motion to Transfer Venue to the Southern District of Florida Under Sections 1391 and 1404 [DE 27].

b. Proposed Discovery Plan.

- i. Generally, the parties expect to exchange written discovery requests (requests for production of documents, interrogatories, and requests for admissions), and to take depositions.
- ii. Each side will serve their first set of document requests and interrogatories on or before June 18, 2025.
- iii. If there will be expert discovery relevant to dispositive liability motions, expert discovery will be completed on or before April 30, 2026, and expert reports will be due on or before April 15, 2026;
- iv. Liability discovery will be completed on or before March 27, 2026;
- v. The deadline to amend pleadings is June 11, 2025.

c. E-Discovery. Discovery will encompass electronically stored information, and the parties plan to ensure that such discovery proceeds appropriately through the negotiation of an ESI protocol. The parties are hopeful that there will not be any electronic discovery disputes.

d. A jury trial has been requested by Plaintiff. Trial will likely span 3 to 5 days.

(3) Consent to Proceed Before a Magistrate Judge

The parties do not unanimously consent to proceed before a Magistrate Judge.

(4) Status of Settlement Discussions

Settlement discussions to resolve the case in its entirety, as follows: (a) Defendant delivered a settlement proposal on April 17, 2025, and (b) Plaintiff delivered a settlement proposal on May 19, 2025. To date, the parties have not resolved this matter. The parties do not request a settlement conference before the Magistrate Judge assigned to the case.

Dated: May 21, 2025

Respectfully submitted,

SP PLUS LLC,

By its attorneys,

/s/ Stephen D. Riden

Stephen D. Riden, MA BBO No. 644451

Admitted Pro Hac Vice

BECK REED RIDEN LLP

155 Federal Street, Suite 1302

Boston, Massachusetts 02110

Phone: (617) 500-8660

sriden@beckreed.com

Timothy D. Elliott

RATHJE WOODWARD LLC

300 E. Roosevelt Road, Suite 220

Wheaton, Illinois 60187

Phone: (630) 510-4910

telliott@rathjelaw.com

DAVIS DINIZ,

By his attorneys,

/s/ Gina Cadogan

Abhishek Ramaswami

Cadogan Law

1200 S. Pine Island Rd., Ste 370

Plantation, FL 33324

Phone: (845) 706-9300

ab@cadoganlaw.com

Gina Cadogan

Admitted Pro Hac Vice

Cadogan Law

1200 S. Pine Island Road, Ste. 370

Plantation, FL 33324

Phone: (954) 606-5891

gina@cadoganlaw.com

CERTIFICATE OF SERVICE

I, Stephen D. Riden, an attorney admitted *pro hac vice*, hereby certify that on May 21, 2025, I caused a copy of the foregoing Joint New Case Status Report to be filed with the Clerk of the Court using the CM/ECF system, which will send an electronic copy of the foregoing to counsel of record and constitutes service under Federal Rule of Civil Procedure 5(b)(2)(D) pursuant to Local Rule 5.9 of the Northern District of Illinois.

/s/ Stephen D. Riden

Stephen D. Riden